

THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET

NEW YORK, NY 10007

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DOCUMENT
ELECTRONICALLY FILED
DOC #:___
DATE FILED:__02/21/2020_

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February 21, 2020

MEMO ENDORSED

Via ECF

JEAME E. JOHNSON

Corporation Counsel

Honorable Katherine H. Parker United States Magistrate Judge United States District Court 500 Pearl Street New York, NY 10007

Re: Washington v. The City of New York, et al.., 19-CV-5395 (PGG) (KHP)

Dear Judge Parker:

I am the Assistant Corporation Counsel assigned to the defense of the City of New York and Reverend Robles in above-referenced action, in which Plaintiff alleges that he has not been permitted to attend religious services.

I am writing to respectfully request a two business day adjournment of the status conference currently scheduled for March 19, 2020 to Monday March 23, 2020 (or a date thereafter that is convenient for the Court), due to a conflict with another case I am assigned to. Specifically, in, *Elisa W., et al., v. The City of New York*, et al.,15 CV 5273 (LTS) (HBP), a putative class action, in which nineteen children in foster care, represented by Cravath, Swaine & Moore LLP and A Better Childhood, seek injunctive relief, the City of New York will be taking the deposition of Plaintiffs' expert in Baltimore, MD on March 19, 2020. I will be heavily involved in preparing for the deposition, particularly since my social science background is relevant to this expert's report. I intend to attend the deposition (if the requested adjournment is granted), and there is a very good chance that I will be the attorney who takes the deposition.

This is Defendant's first request for an extension. I have not been able to reach Plaintiff to obtain his consent to this request, as he is incarcerated. Thank you for your consideration of this request.

Respectfully,

Sharon Sprayregen Assistant Corporation Counsel

cc: Landon L. Washington
NYSID: 01930776N
B&C No. 3491901974
George R. Vierno Center (GRVC)
Manhattan Detention Complex
09-09 Hazen Street
E. Elmhurst, NY 11370

APPLICATION GRANTED: The Telephone Conference in this matter that is scheduled for Thursday, March 19, 2020 at 10:00 a.m. is hereby rescheduled to Thursday, April 2, 2020 at 10:30 a.m. It is hereby ORDERED that the Warden or other official in charge of the GRVC- George R. Vierno Detention Center produce plaintiff Landon L. Washington., Book & Case # 3491901974/NYSID # 01930776N, on April 2, 2020, no later than 10:30 a.m., to a suitable location within the GRVC-George R. Vierno Detention Center that is equipped with a telephone, for the purpose of participating by telephone in a conference with the Court and defendants counsel. If the scheduled time and date presents a hardship, the Warden or the Warden's designee should promptly inform chambers by calling (212) 805-0234. Defendants' counsel must: (1) send this Order to the Warden immediately; (2) contact the GRVC-George R. Vierno Detention Center to arrange the call and determine the telephone number at which the plaintiff will be reachable at the above time and date; and (3) telephone chambers at (212) 805-0234, with the plaintiff on the line, at the time and date of the conference.

The Clerk of Court is requested to mail a copy of this order to the Plaintiff.

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J. 02/21/2020